

ISMAIL J. RAMSEY (CABN 189820)
 United States Attorney
 PAMELA T. JOHANN (CABN 145558)
 Chief, Civil Division
 MICHAEL A. KEOUGH (NYRN 5199666)
 Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
 San Francisco, California 94102-3495
 Telephone: (415) 436-6878
 Fax: (415) 436-7234
 michael.keough@usdoj.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

RENÉ QUIÑONEZ and MOVEMENT INK LLC,)	Case No. 3:22-CV-03195-WHO
)	
Plaintiffs,)	[PROPOSED] ORDER
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	
)	

The Court hereby ORDERS that the Designated Material referenced in Defendant's Response to the Administrative Motion to Consider Whether Another Party's Material Should Be Sealed (Dkt. 120) will be treated as follows:

Item to Be Sealed	Reason	Ruling on Sealing
Former U.S. Postal Inspection Service ("USPIS") contractor Stephen Fajardo deposition transcript, pages 20-24, 33-80, 82-115, 115-133, 141-153	Testimony regarding law enforcement sensitive information and techniques related to USPIS' Administrative Nonmailability Protocol ("ANP"), as well as testimony regarding deposition exhibits below separately identified as confidential	
Deposition Exhibit 4 (Fajardo)	E-mail correspondence regarding	

	ANP investigation	
Deposition Exhibit 5 (Fajardo)	E-mail correspondence regarding ANP investigation	
Former USPIS contractor Carlos Ruiz deposition transcript, pages 12-100, 102-142	Testimony regarding law enforcement sensitive information and techniques related to ANP	
USPIS 30(b)(6) deposition transcript (Postal Inspector Jeff Agster), pages 15-185 and 193-197	Testimony regarding law enforcement sensitive information and techniques related to ANP, as well as testimony regarding deposition exhibits below and deposition exhibits separately identified as confidential but not attached to transcript filed by Plaintiffs	
Deposition Exhibit 48	ANP procedures document for USPIS Contraband Interdiction & Investigations	
Deposition Exhibit 49	E-mail correspondence regarding ANP investigation	

IT IS SO ORDERED.

DATE:

THE HONORABLE WILLIAM H. ORRICK
United States District Judge